

1 ROBINS, KAPLAN, MILLER & CIRESI L.L.P.

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17 *Associates, Inc., and Neal Stern*

18 **UNITED STATES DISTRICT COURT**  
19 **SOUTHERN DISTRICT OF CALIFORNIA**

20 **IN RE: PORTFOLIO RECOVERY**  
21 **ASSOCIATES, LLC, TELEPHONE**  
22 **CONSUMER PROTECTION ACT**  
23 **LITIGATION**

Case No. 3:11-md-02295-JAH(BGS)

Hon. John A. Houston  
Hon. Bernard G. Skomal

THIS DOCUMENT RELATES TO:  
All Member Cases

**DEFENDANTS' NOTICE OF MOTION**  
**AND MOTION TO STAY OR DISMISS**  
**ACTION ON PRIMARY**  
**JURISDICTION GROUNDS**

Date: March 3, 2014  
Time: 2:30 PM  
Location: Courtroom 11, Second Floor  
Edward J. Schwartz Courthouse  
940 Front Street  
San Diego, California 92101

[Memorandum of Points and Authorities  
filed concurrently herewith]

24 **TO ALL PARTIES AND THEIR COUNSEL OF RECORD:**

PLEASE TAKE NOTICE that on March 3, 2014, at 2:30 p.m., or as soon thereafter as the matter may be heard, in the Courtroom of the Honorable John A. Houston of the above-entitled Court, located at 940 Front Street, San Diego, California, 92101-8900, Defendants Portfolio Recovery Associates, LLC, Portfolio Recovery Associates, Inc., and Neal Stern (collectively, "PRA") will and hereby do move the Court for an Order Staying or Dismissing this action based on the doctrine of primary jurisdiction.

This Motion is based upon this Notice, the attached Memorandum of Points and Authorities filed concurrently herewith, any and all supporting documents attached thereto, and upon argument as may be presented at or before the time of the hearing on this motion.

January 23, 2014

**ROBINS, KAPLAN, MILLER & CIRESI L.L.P.**

By: s/Jennifer M. Robbins

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